

# **SILVER STATE LEADERSHIP FUND**

6502 South McCarran Boulevard, Suite D

Reno, Nevada 89509

(775) 823-3777

Via Certified Mail: 7005 2570 0001 8538 9084

November 2, 2006

Federal Election Commission  
999 East E Street NW  
Washington, DC 20463

Re: MUR 5844

Ladies and Gentlemen:

We are in receipt of your letter and the copy of the complaint alleging that the Silver State Leadership Fund received corporate contributions after November 5, 2002 and/or such contributions were in excess of the maximum amount of contributions that are allowable.

The contributions identified in the complaint are as follows:

The Walters Group	\$ 2,000
Cal Neva Resort	\$ 2,000
Newmont Mining Corp.	\$10,000
Placer Dome America	\$ 2,500
Management Technology	\$ 5,000

We are enclosing copies of the checks for each of the above contributions.

As you can see from the checks, the contributions from all of the above entities except Cal Neva Resort and The Walters Group were dated and received prior to the November 6, 2002, change in law that created a new prohibition on these types of corporate contributions and reduced the annual contribution limit to \$5,000.

We were advised by The Walters Group that it is not a corporation. An entity with a similar name, Fusca-Walters Group, LLC, was registered with Nevada's Secretary of State during this time period as a limited liability company. This may or may not have been the same entity, but it is now dissolved.

Upon information and belief, the Cal Neva Resort is not a corporation. There are eighty-seven (87) entities registered with Nevada's Secretary of State that contain the

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

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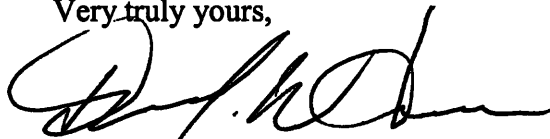
name Cal Neva. They include corporations, limited liability companies and limited partnerships. However, there is no entity registered under the name "Cal Neva Resort". Nevada law requires all corporations doing business in Nevada to register with Nevada's Secretary of State, and therefore we presume the absence of such registration indicates the donor is not a corporation. We also contacted the Washoe County Clerk to determine if the name was a fictitious business name used by a corporation or other type of entity. The Washoe County Clerk informed us that the fictitious name, "Cal Neva Resort", had been issued in 2004 to a limited liability company. However, this is substantially later than the time of the questioned contribution and thus appears to relate to a different party.

In short, to the best of our knowledge and belief the contributions in question either (i) were made prior to the November 6, 2002, change in law and therefore remain proper; or (ii) were not made from corporations.

If you need any additional information to resolve this complaint, please contact the undersigned.

While I was not the treasurer of this organization at the time of the above transactions, I declare, under the penalty of perjury, that to the best of my knowledge and belief the above statements are true and correct.

Very truly yours,



David W. Turner  
Treasurer

DWT:ab

Copy:  
Honorable James A. Gibbons

27044162994

THE WALTERS GROUP

2249

Vendor No: SILPAC / Name: Silver State PAC  
VENDOR NO. NAME

2249

INVOICE	REFERENCE	INVOICE DATE	INV AMOUNT	DISCOUNT	ADJ AMT	AMT PAID
02604INT		10/26/04	2000.00	0.00	0.00	2000.00
			Check Date 10/26/04	Total		2000.00

THE WALTERS GROUP

GENERAL ACCOUNT  
5500 E. FLAMINGO RD.  
LAS VEGAS, NV 89122  
(702) 450-8001

SILVER STATE BANK  
400 N. GREEN VALLEY PKWY.  
HENDERSON, NV 89014  
94-183/1224

2249

2249

\*\*\*Two Thousand & No/100 Dollars

DATE  
10/26/04

AMOUNT  
\$2,000.00

Silver State PAC

PAY TO THE  
ORDER OF

  
AUTHORIZED SIGNATURE

27044162995

Security features Details on back

CHECK NO.	CHECK DATE	VENDOR NO.
70992	09/25/03	*00000115085

BANK OF AMERICA  
RENO, NEVADA 89520-0025

**CALNEVA RESORT  
LAKE TAHOE**  
POST OFFICE BOX 368  
CRYSTAL BAY, NV 89402  
TELEPHONE (775) 832-4000

CHECK NO. 070992

TWO THOUSAND AND 00/100 DOLLARS

CHECK AMOUNT
\$2,000.00

SILVER STATE LEADERSHIP FUND  
P.O. BOX 7357

RENO

NV 89510-7537

  
AUTHORIZED SIGNATURE

☒ THE SECURITY FEATURES ON THIS DOCUMENT INCLUDE A GREEN BACKGROUND, BLEED THROUGH MICR NUMBERING AND A MICROPRINT SIGNATURE LINE NOTED BY MP

2704415996  
A03  
THE  
FEDER OF

270441022997

VERIFY THE AUTHENTICITY OF THIS MULTI-TONE SECURITY DOCUMENT. CHECK BACKGROUND AREA CHANGES COLOR GRADUALLY FROM TOP TO BOTTOM.

NEWMONT MINING CORPORATION

1700 Lincoln Street  
Denver, CO 80203

CHASE MANHATTAN BANK  
1201 MARKET STREET  
WILMINGTON, DELAWARE 19801  
1675-087

CHECK  
NUMBER 201318

VENDOR NO.

8185

DATE

23-OCT-02

AMOUNT

\$\*\*\*\*\*10,000.00

PAYABLE IN U.S. DOLLARS

PAY Ten Thousand Dollars and no cents.

TO THE  
ORDER  
OF

SILVER STATE LEADERSHIP FUND  
5421 1/2 PLUMAS ST  
RENO, NV 89509  
United States

*[Signature]*

VOID AFTER 180 DAYS

THE ORIGINAL

MARK WHEN CHECKING THE ENDORSEMENT.



PLACER DOME AMERICA - *Barrack*  
(PDAHC) - *Holding Company*  
1125 SEVENTEENTH STREET, SUITE 2310  
DENVER, COLORADO 80202

WELLS FARGO BANK  
SAN FRANCISCO RCBO  
420 MONTGOMERY ST. 0101-01  
SAN FRANCISCO CA 94163

Check No.  
**1685**

October 17, 2002

PAY

EXACTLY **\$2,500.00**  
CTS CTS

U.S. FUNDS \$2,500.00

SILVER STATE LEADERSHIP FUND  
542 1/2 PLUMAS ST.  
RENO, NV 89509

PLACER DOME AMERICA

PER *Bruce Wool*

PER *Rex W. Jensen*

27044160998  
the order of

27044162999

2007 Day  
**MANAGEMENT  
TECHNOLOGY**

FAIRFAX- CORP.  
12015 LEE JACKSON HIGHWA  
Fairfax, VA 220333300

CITIZENS BANK  
701 Market Street  
philadelphia, PA 19101

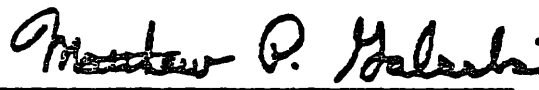
039341

Date November 01, 2002

Pay Amount \*\*\*55,000.00\*\*\*

Pay \*\*\*\*FIVE THOUSAND AND XX / 100 DOLLAR\*\*\*\*

To The Order of SILVER STATE LEADERSHIP PAC  
2535 KENNY LANE  
RENO, NV 89511



Authorized Signature